## I.     INTRODUCTION/EXECUTIVE SUMMARY

This report summarizes the discussions, strategies, rationale and related information of the Flexible Scheduling/"Big Bucket" Records Scheduling Analysis.  A National Archives and Records Administration (NARA) Team was assigned to present new and/or different ideas that will provoke discussion and lead to the development of frameworks for records schedules that are different from how NARA and Federal agencies currently conduct this activity.

The purpose of this analysis is twofold:

> (a) to present strategies for discussion that may lead to the empowerment of agencies to determine for themselves how best to manage their records; and that may help agencies to conserve resources so that they may be focussed on agency records management priorities, and

> (b) to streamline records scheduling and appraisal process for agencies and NARA.

This analysis is based on current NARA laws, regulations, and information provided to agency records officers.  The Team also used as supporting documentation the SRA International study titled *Report on Current Recordkeeping Practices within the Federal Government* (December 10, 2001), the Deputy Archivist's *National Archives and Records Administration Proposal for A Redesign of Federal Records Management* (Draft, July 2002), and the Office of Management and Budget's (OMB) *The Business Reference Model, A Foundation for Government-wide Improvement* (www.feapmo.gov, 2002).  In addition, members of the Team met with Richard Marcus, the NARA records officer, to collect information about functions within NARA that could be tested as pilot projects.

As stated in the Deputy's *Proposal*, NARA "would change our scheduling and appraisal process so that, except for records of archival value, agencies can schedule records at any level of aggregation that meets their business needs." (page 5)  This is based on the understanding that Federal records scheduling and appraisal practices have become problematic.  As stated in the Deputy's report, "the proliferation of records and of formats, and the break down of central filing systems, makes it a daunting task to develop detailed inventories and schedules in traditional ways at the traditional series level.  In addition, detailed, series based filing systems are not always necessary in an automated retrieval environment.  Yet the current regime (with the exception of some emerging test cases) is still largely based at the series level.  Agencies are also called upon to do what to them seems like 'busy work' to meet NARA scheduling requirements. ….  Current processes also call for agencies and NARA to commit far too much effort in inventorying and scheduling many routine records.  One of the results is that many records that are significant from the standpoint of rights, accountability, or archival value are not being scheduled, and consequently are at risk of not being retained for as long as they are needed." (page 9)

In addition, the vast majority of records retention schedules are out of date and inaccurate.  A large majority of electronic records systems of archival value are not coming into archival custody.  The more agencies shift to conducting their business electronically, the worse the records scheduling situation is likely to become if alternative strategies to records scheduling are not developed.  The "Big Bucket" approach would encourage agencies to develop records schedules for disposable program (mission-related) records at as high a level of aggregation as would meet their business needs.  The schedules could cut across units of organizations (functional approach).  The difference from the current approach would be that the unit to be scheduled would not necessarily be the records series, but all records (in all media) relating to a work process, group of work processes, or a broad program area to which the same minimum length of retention would be applied.

This report does not provide instructions for specific revisions to current laws, nor does it include drafts of possible records schedules for each strategy, thereby excluding specific conclusions and recommendations.

## II.    DEFINITIONS

Flexible Scheduling:  Provides for concrete disposition instructions that may be applied to groupings of information and/or categories of records (media-neutral buckets).  Flexibility is in defining record groupings.  As currently written in 36 CFR 1228, flexibility does not apply to the adjustment (decrease) of disposition instructions without the Archivist's prior approval, and without approval from the General Accounting Office for a less than 3-year retention for program records.

Big Buckets:  The application of appraisal criteria to multiple similar or related groupings of information across one or multiple agencies to establish a uniform retention period. This could establish Government-wide retention standards for permanent and disposable program records.  This process also enables agencies to define the arrangement of information at the office level.

Records/Retention Banding:  This process is an arrangement and disposition tool that can be applied to individual or groups of record series/systems to establish consistent retention periods.  This allows for series/systems within work process functions to have the same stated minimum and maximum retention periods.  The "Big Bucket" and banding concepts are not mutually exclusive, and give agencies the retention flexibility they need to manage their records.  This also allows for the office-level filing of records by agency staff and the establishment of file plans.

## III.    OVERALL FINDINGS

The current mechanisms used by agencies and NARA to schedule and appraise Federal records do not empower agencies to determine for themselves how best to manage their records and

result in extensive expenditure of agency and NARA resources.  Below is a list of the strategies for consideration.  These strategies are in random order and are interchangeable.

Strategies

At the most general level, there are four strategies:

- Records scheduling and appraisal based on Business Areas, Lines of Business, and Subfunctions within each business line as identified in the Office of Management and Budget *Business Reference Model* – scheduling and appraisal within each distinct business line (stovepipe/vertical).
- Records scheduling and appraisal based on Business Areas, Lines of Business, and Subfunctions across business lines as these are identified in the Office of Management and Budget *Business Reference Model* – scheduling and appraisal across intersecting/overlapping business lines (horizontal).
- Records scheduling and appraisal based on the mission/program functions within each separate Federal department and/or agency, including (1) records scheduling and appraisal based on agencies business needs and assurances that proposed temporary retention periods are appropriate to ensure Government accountability and the protection of citizens rights and interests, and (2) records scheduling and appraisal based on the identification by NARA and agencies of those records that document the national experience and significant roles played by the Federal Government.
- Records scheduling and appraisal based on groupings of like subject matters and/or work processes shared by agencies.

## IV.     ANALYSIS OF STRATEGIES

Strategy 1: Records scheduling and appraisal are based on Business Areas, Lines of Business, and Subfunctions within each business line as identified in the Office of Management and Budget *Business Reference Model* – scheduling and appraisal within each distinct business line (stovepipe/vertical).

Under this strategy, large categories of records would be identified and analyzed based on OMB's *Business Reference Model.* This would be a vertical stovepipe approach, where only those records that strictly relate to a business line or to a subfunction of a business line would be examined across departments and agencies. For example, under the business line Recreation and Natural Resources, only records related strictly to conservation planning, land and monument management, and tourism management would be analyzed and scheduled. Records that might also be created as part of a department or agency's work related to this subfunction, such as environmental monitoring (a subfunction within the Environmental Management business line), would not be included in the analysis. The analysis will take a media neutral approach to scheduling records.

*Rationale*

- May result in collaboration between NARA archivists and various NARA internal and external stakeholders.  NARA units would work in a team environment with NARA and other stakeholders to develop appraisal recommendations for specific lines of business and sub-function work processes.
- Federal Register process could be completed before NARA begins appraisal process.
- Enables NARA to be more focussed on permanent records.
- Common data elements for permanent electronic records would be identified for records with related subfunctions in different agencies.
- Opportunity to collaborate with OMB on lines of business definitions.

Strategy 2: Records scheduling and appraisal are based on Business Areas, Lines of Business, and Subfunctions across business lines as these are identified in the Office of Management and Budget *Business Reference Model* – scheduling and appraisal across intersecting/overlapping business lines (horizontal).

The business line or subfunction would serve as a starting point, and the analysis would encompass related work processes (regardless of agency or department) that cross business lines and subfunctions.  For example, the subfunction of Public Health Monitoring relates to the other subfunctions within the Public Health business line, and also relates to Medical Services, Scientific Research and Development, Consumer Products Quality Assurance, Environmental Monitoring, and Pollution Prevention and Control subfunctions.  The analysis will take a media neutral approach to scheduling records.

*Rationale*

- May result in collaboration between NARA archivists and various NARA internal and external stakeholders.  NARA units would work in a team environment with NARA and other stakeholders to develop appraisal recommendations for specific lines of business and sub-function work processes.
- Federal Register process could be completed before NARA begins appraisal process.
- Enables NARA to be more focussed on permanent records.
- Common data elements for permanent electronic records would be identified for records with related subfunctions in different agencies.
- Opportunity to collaborate with OMB on lines of business definitions.

Strategy 3: Records scheduling and appraisal based on the mission/program functions within each separate Federal department and/or agency. Records scheduling and appraisal will be based on the mission/program functions within each separate Federal department and/or agency, including (1) records scheduling and appraisal based on agencies business needs and assurances

that proposed temporary retention periods are appropriate to ensure Government accountability and the protection of citizens rights and interests, and (2) records scheduling and appraisal based on the identification by NARA and agencies of those records that document the national experience and significant roles played by the Federal Government.

This strategy is the closest to the existing scheduling process. Under this strategy, categories of records would be identified and analyzed based on their relationship to a department's or agency's broad mission areas or programmatic work processes. The records analysis under this strategy would not cut across agency lines, but rather would concentrate on the functions unique to a particular department or agency. The analysis would focus on identifying "big bucket" categories for each mission area. **Of course, agencies can identify the number of retention periods they need to meet their business needs.**

For temporary records, agencies will need to assure NARA that the retention buckets and/or bands for temporary records are appropriate to meet their business needs, ensure Government accountability, and protect citizens rights and interests.  For permanent records, NARA and agencies will work closely on the identification of those historically valuable records, including those that document the national experience and significant roles played by the Federal Government, and ensure the timely transfer of these records into the custody of the National Archives. This strategy will also take a media neutral approach to scheduling records.

### *Rationale*

- Supports the proposal (i.e. process-oriented) and it allows agencies to manage records at a level of aggregation of their choosing.
- This strategy is directly tied to agency regulations and recordkeeping requirements.
- With the two-item (or more, depending on each agency's needs) schedule, NARA only identifies the permanent records.  The agency is responsible for identifying the minimum retention for temporary records, and for assuring that the retention is appropriate to meet its business needs, ensures Government accountability, and protects the rights and interests of the citizen.
- Easier to reconcile schedules.
- Collaboration between NARA archivists and various internal and external stakeholders.
- Scheduling of permanent records at lower levels of aggregation and in greater detail would enhance the eventual transfer of these records to NARA.

Strategy 4: Records scheduling and appraisal based on groupings of like subject matters and/or work processes shared by agencies.  The subject will need to be mapped to specific processes or business functions.

This approach would entail analysis of records across department and agency lines based on similar subjects.  The team envisions this as a very narrow approach to records scheduling, much

more so than the first three strategies. This analysis would also take a media neutral approach to scheduling records.

## *Rationale*

- Would solve the problem of contradictory retention periods for similar records across the Government.
- Identification of permanent records.
- May result in the development of additional General Records Schedules.
- This strategy might be more desirable to agencies that are reluctant to make the major transition of going to the two-item "Big Bucket" schedule.
- This strategy could be scaled to fit the needs of agencies.
- Across the work process continuum, may identify official recordkeeping copies and reduce unnecessary duplication.